

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
NEWMAN DIVISION

UNITED STATES OF AMERICA :
:
v. : Criminal Action No.
: 3:21-CR-0004-TCB-RGV
ROBERT PURBECK :
:

**UNOPPOSED MOTION FOR EXTENSION OF TIME IN WHICH TO FILE
OBJECTIONS TO MAGISTRATE COURT'S REPORT AND RECOMMENDATION**

Defendant Robert Purbeck hereby respectfully requests that the Court extend the deadline for him to file objections to the Magistrate Court's Report and Recommendation. The government does not oppose this request for an extension of time.

At present, Mr. Purbeck's deadline to file objections is this Thursday, June 1, 2023. However, Mr. Purbeck was not aware that the Court had issued a Report and Recommendation ("R&R") until this past Friday, May 26, 2023, when a copy arrived in the United States Mail at Mr. Purbeck's counsel's law office. That same day, the deputy courtroom deputy also emailed a copy to the parties. Undersigned counsel, however, was out of the office on a previously filed leave of absence.

The Magistrate Court issued the R&R on May 18, 2023. Because the R&R was filed under seal, counsel did not receive

notice through the Court's ECF system. The May 26th physical delivery of the R&R through the mail and by email was the first counsel learned that the Court had issued a R&R.

The R&R is 128 pages long. It covers multiple motions to suppress. Each motion covers multiple issues, which were the subject of extensive briefing by the parties. The R&R recommends denying all of Mr. Purbeck's motions, and Mr. Purbeck has only started analyzing what objections he may want to file to the R&R. Given the length of the R&R and that he has only just received the R&R, Mr. Purbeck will be unable to complete his analysis and objections by the current deadline of this upcoming Thursday.

Counsel has communicated with the government, and the government has advised that it has no objection to Mr. Purbeck receiving an extension of time in which to file his objections through at least June 26, 2023. Accordingly, Mr. Purbeck hereby respectfully requests that the Court grant this motion and extend the time for Mr. Purbeck to file his objections to the R&R to and through June 26, 2023.

WHEREFORE, for the reasons stated above, Defendant Robert Purbeck requests that the Court grant this motion and the relief sought herein.

Respectfully submitted, this 30th day of May, 2023.

/s/ Andrew C. Hall

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Counsel for Defendant Robert Purbeck

CERTIFICATE OF COMPLIANCE WITH TYPE AND FONT
AND CERTIFICATE OF SERVICE

I hereby certify that this motion has been prepared in Courier New font (13 pt.) and consistent with the Local Rules of this Court.

I further hereby certify that I have this date caused a true and correct copy of the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME IN WHICH TO FILE OBJECTIONS TO MAGISTRATE COURT'S REPORT AND RECOMMENDATION to be served by filing it with the Clerk of Court using the ECF System that will send notification of such filing to:

Assistant United States Attorneys Michael Herskowitz and Alex Sistla.

This 30th day of May, 2023.

/s/ Andrew C. Hall
Andrew C. Hall